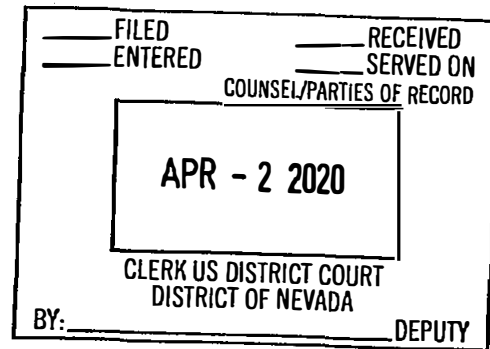


1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

SEALED

MONTI JORDANA LEVY, ESQUIRE
WRIGHT MARSH & LEVY
Nevada Bar No. 8158
300 S. Fourth Street
Suite 701
Las Vegas, NV 89101
Phone: (702) 382-4004
Fax: (702) 382-4800
Email: mlevy@wmllawlv.com
Attorney for Karolina Moya



UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)
Plaintiff,)
vs.)
KAROLINA MOYA,)
Defendant.)

CASE NO. 2:20-cr-00010-APG-BNW

**STIPULATION TO CONTINUE
PLEA HEARING
(FIRST REQUEST)**

IT IS HEREBY STIPULATED AND AGREED, by and between the NICHOLAS A. TRUTANICH, United States of America, and KEVIN D. SCHIFF, Assistant United States Attorney, counsel for the United States of America, MONTI JORDANA LEVY, ESQUIRE, WRIGHT MARSH & LEVY, counsel for KAROLINA MOYA; that the Plea Hearing currently scheduled for April 22, 2020 at 10:30 a.m., be vacated and continued to a date and time convenient to the Court, but no sooner than 60 days.

This Stipulation is entered into for the following reasons:

1. Defendant Moya wants to meet in person with her attorney to further discuss aspects of the plea agreement.
2. Defendant Moya also wants to be present for the plea hearing and as of now is unable to travel due to the restrictions regarding the COVID-19 pandemic.
3. Karolina Moya is not detained and agrees to the continuance.
4. Government counsel does not object to this continuance.

1 5. Additionally, denial of this request for a continuance could result in a miscarriage of
2 justice.

3 This is the first request for a continuance filed herein.

4 DATED this 1st day of April, 2020.

5 WRIGHT MARSH & LEVY

NICHOLAS A. TRUTANICH
United States Attorney

6
7 By /s/ Monti Jordana Levy
8 MONTI JORDANA LEVY, ESQUIRE
Counsel for Karolina Moya

By /s/ Kevin D. Schiff
KEVIN D. SCHIEFF
Assistant United States Attorney

1
2 UNITED STATES DISTRICT COURT
3 DISTRICT OF NEVADA

4 UNITED STATES OF AMERICA,)
5 Plaintiff,)
6)
7 vs.)
8 KAROLINA MOYA,)
9 Defendant.)

CASE NO. 2:20-cr-00010-APG-BNW

ORDER

10 Based on the Stipulation of the parties and good cause appearing.

11 IT IS THEREFORE ORDERED that the Plea Hearing in the above-captioned matter
12 currently scheduled for April 22, 2020 at 10:30 a.m., be vacated and continued to
13 August 18, 2020 at 11:30 a.m. in Courtroom 6C.

14 DATED this April 3, 2020.

15
16 
17 ANDREW P. GORDON
United States District Judge